



IDAHO
CONSERVATION
LEAGUE

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March 9, 2021

Michelle Pirzadeh
EPA Regional Administrator
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Lynne Ann Hood
Site Cleanup Section 4
EPA R10-Idaho Operations Office
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Dear Ms. Pirzadeh and Ms. Hood,

Re: Meeting request on CERCLA activities at the Smoky Canyon Mine

I'm writing on behalf of the Crow Creek Conservation Alliance, Earthworks, and Idaho Conservation League to request a meeting to discuss the status of the CERCLA clean-up activities at the Smoky Canyon Mine in southeast Idaho.

The Crow Creek Conservation Alliance is comprised of private landowners directly downstream from the Smoky Canyon Mine, who are adversely affected by the selenium pollution from the Smoky Canyon Mine. Idaho Conservation League, Greater Yellowstone Coalition and Earthworks are state, regional and national conservation organizations, dedicated to protecting clean water and healthy ecosystems.

Earthworks, the Greater Yellowstone Coalition and the Crow Creek Conservation Alliance have collected fish tissue data downstream from the mine for many years, documenting the continued increase in selenium concentrations (please see attachments). We recently commissioned fisheries biologist Jim Gregory to conduct an analysis of Simplot's fish population data. This analysis demonstrates that the increase in selenium pollution in these waterways has caused a statistically significant decline in juvenile Yellowstone Cutthroat Trout, indicating that these native trout are experiencing population level effects from reduced recruitment (also attached).

The recent East Smoky Canyon DEIS also documents a significant and consistent loss of juvenile brown trout in Sage Creek and Hoopes Spring.¹

While we appreciate that a water treatment plant was finally constructed in 2017 to treat selenium in discharges from the spring complex, the water treatment plant is treating only half of the contaminated flows. Furthermore, the water treatment plant discharge does not meet the site-specific selenium standard. More clean-up activities are necessary to reduce selenium concentrations to levels that are safe for fish and return these streams to their beneficial uses.

We are deeply concerned at the continued selenium pollution at Smoky Canyon and the ongoing harm to these important fish populations. We request a meeting at your earliest convenience to discuss the status of CERCLA cleanup at Smoky Canyon.

We look forward to your response.

Sincerely,



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¹ USFS, BLM, Final Environmental Impact Statement for the proposed East Smoky Panel Mine Project at Smoky Canyon Mine, Appendix 6B, February 2020, p. 21-22. (persistent recruitment failure from 2013-2017)